

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

THE DRAGONWOOD CONSERVANCY, INC.,
PLEGUAR CORPORATION,
TERRY CULLEN,

Plaintiffs,

v.

Case No. 16-CV-00534

PAUL FELICIAN,
PHIL SIMMERT II,
JANE AND JOHN DOE(S)
CITY OF MILWAUKEE, and
ABC INSURANCE COMPANY,

Defendants.

**DECLARATION OF HEATHER HOUGH IN SUPPORT OF MOTION TO
PRECLUDE PLAINTIFFS' EXPERT MITCHEL KALMANSON**

I, Heather Hough, being first duly sworn, swear and state as follows:

1. I am an attorney, licensed to practice law in the State of Wisconsin, employed as an Assistant City Attorney for the City of Milwaukee.

2. I have been assigned to represent the interests of the City of Milwaukee, Paul Felician and Phil Simmertt, II in the above-captioned case.

3. Attached and incorporated as Exhibit 1 is a true and correct copy of Defendants' First Set of Interrogatories and Request for Production of Documents dated January 8, 2020.

4. Attached and incorporated as Exhibit 2 is a true and correct copy of Plaintiffs' e-mailed Response to Defendants' Interrogatories and Request for Production of Documents dated April 28, 2020.

5. Attached and incorporated as Exhibit 3 is a true and correct copy of Defendants' Second Set of Interrogatories and Request for Production of Documents with cover clarifying our second request for documents dated May 21, 2020.

6. Attached and incorporated as Exhibit 4 is a true and correct copy of e-mail Plaintiffs received from Defendants' counsel responsive to the request for documents dated May 29, 2020.

7. Attached and incorporated as Exhibit 5 is a true and correct copy of Mitchel Kalmanson's Deposition Transcript dated June 10, 2020.

8. Attached and incorporated as Exhibit 6 is a true and correct copy of Defendants responsive e-mail with attachments including new source information and peer review letters dated June 30, 2020. June 30, 2020 is the first time that defendants were made aware of the peer review letters or the authors of the peer review letters.

I declare under penalty of perjury that the foregoing eight (8) paragraphs are true and correct.

Dated and signed at Milwaukee, Wisconsin on July 13, 2020.

TEARMAN SPENCER
City Attorney

s/Heather Hecimovich Hough
HEATHER HECIMOVICH HOUGH
Assistant City Attorney
State Bar No.1092637
JENNY YUAN
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Assistant City Attorney
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City of Milwaukee, Paul Felician, Phil Simmert

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